

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

---

Wisconsin Voters Alliance, et al.

Case No. 1:20-cv-01487-WCG

Plaintiffs,

v.

City of Racine, et al.

Defendants.

---

**DEFENDANTS' JOINT MOTION TO DISMISS  
PURSUANT TO FEDERAL RULE 12(b)1**

---

Defendants City of Racine, City of Milwaukee, City of Kenosha, City of Green Bay, and City of Madison, by their attorneys, hereby move this Court pursuant to Federal Rule of Civil Procedure 12(b)1 for dismissal of the proceedings.

The grounds for the Defendants' Motion are that the Court lacks subject-matter jurisdiction pursuant to Rule 12(b)1, which is argued in detail in the accompanying Defendants' Joint Brief in Support of Motion to Dismiss Proceedings.

This Motion is in response to the allegations in the Complaint and the Memorandum in Support of Plaintiffs' Motion for a Temporary Restraining Order. Defendants file concurrently herewith Defendants' Joint Brief in Support of this Motion.

WHEREFORE, Defendants City of Racine, City of Milwaukee, City of Kenosha, City of Green Bay, and City of Madison respectfully request that this Court enter an Order dismissing the Plaintiffs' Complaint and Motion for a Temporary Restraining Order, with prejudice, and for such other and further relief as this Court deems just and proper.

Dated at Kenosha, Wisconsin, this 9<sup>th</sup> day of October, 2020.

s/ Vanessa R. Chavez

Vanessa R. Chavez (State Bar No. 1103015)  
Lindsay J. Mather (State Bar No. 1086849)  
*Attorneys for Defendant, City of Green Bay*  
CITY OF GREEN BAY  
100 N. Jefferson Street, Room 200  
Green Bay, WI 54301  
Telephone: (920) 448-3080  
Facsimile: (920) 448-3081  
[Vanessa.Chavez@greenbaywi.gov](mailto:Vanessa.Chavez@greenbaywi.gov)  
[Lindsay.Mather@greenbaywi.gov](mailto:Lindsay.Mather@greenbaywi.gov)

s/ Bryan A. Charbogian

Bryan A. Charbogian (State Bar No. 1113801)  
Edward R. Antaramian (State Bar No. 1019160)  
Christine M. Gentner (State Bar No. 1000608)  
*Attorneys for Defendant, City of Kenosha*  
CITY OF KENOSHA  
Kenosha City Attorney's Office  
625 52<sup>nd</sup> Street  
Kenosha, WI 53140-3480  
Telephone: (262) 653-4170  
Facsimile: (262) 925-5933  
[eantaramian@kenosha.org](mailto:eantaramian@kenosha.org)  
[cgentner@kenosha.org](mailto:cgentner@kenosha.org)  
[bcharbogian@kenosha.org](mailto:bcharbogian@kenosha.org)

s/ Michael R. Haas

Michael R. Haas (State Bar No. 1020889)  
Patricia A. Lauten (State Bar No. 1030520)  
Steven C. Brist (State Bar No. 1005479)  
*Attorneys for Defendant, City of Madison*  
CITY OF MADISON  
Office of the City Attorney  
City-County Building, Room 401  
210 Martin Luther King, Jr. Boulevard  
Madison, WI 53703-3345  
Telephone: (608) 266-4511  
Facsimile: (608) 267-8715  
[mhaas@cityofmadison.com](mailto:mhaas@cityofmadison.com)  
[plauten@cityofmadison.com](mailto:plauten@cityofmadison.com)  
[sbrist@cityofmadison.com](mailto:sbrist@cityofmadison.com)

s/ Scott R. Letteney

Scott R. Letteney (State Bar No. 1000559)  
*Attorney for Defendant, City of Racine*  
CITY OF RACINE  
730 Washington Avenue, Room 201  
Racine, WI 53403  
Telephone: (262) 636-9115  
Facsimile: (262) 636-9570  
[scott.letteney@cityofracine.org](mailto:scott.letteney@cityofracine.org)

s/ Kathryn Z. Block

Kathryn Z. Block (State Bar No. 1029749)  
James M. Carroll (State Bar No. 1068910)  
*Attorneys for Defendant, City of Milwaukee*  
CITY OF MILWAUKEE  
Milwaukee City Attorney's Office  
200 E. Wells Street, Room 800  
Milwaukee, WI 53202-3515  
Telephone: (414) 286-2601  
Facsimile: (414) 286-8550  
[kblock@milwaukee.gov](mailto:kblock@milwaukee.gov)  
[jmcarr@milwaukee.gov](mailto:jmcarr@milwaukee.gov)